

1 THE HONORABLE JOHN C. COUGHENOUR
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8 UNITED STATES DISTRICT COURT
9
WESTERN DISTRICT OF WASHINGTON
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AT SEATTLE

11 JERRY ADAMSKY, on behalf of her minor
12 child, LESLIE BERRY, on behalf of her
13 minor child, VALERIE BERTHELOT, on
14 behalf of her minor child, DESIREE
15 BLACKBURN, on behalf of her minor child,
16 JENNIFER BOIT, on behalf of her minor
17 child, JULIE BROWN, on behalf of her
18 minor child, SARAH CHARACTER, on
19 behalf of her minor child, LINDSAY
20 COLON, on behalf of her minor child,
21 KRISTI FINLEY, on behalf of her minor
22 child, CHRISTINA GARDNER, on behalf of
23 her minor child, TARA GRAY, on behalf of
24 her minor child, SHANE HOWARD, on
25 behalf of his minor child, JENNIFER
26 LEFLORE, on behalf of her minor child,
27 ANDRA LOGAN, on behalf of her minor
child, JENNIFER MAURER, on behalf of
MONICA MENDEZ, on behalf of her minor child,
ERIC MOORE, on behalf of her minor child,
BRANDIE MORGAN, on behalf of her minor child,
SAYUJ PAUDEL, on behalf of her minor
child, TARA PITTMAN, on behalf of her
minor child, LYNDI REICHENBACH, on
behalf of her minor child, CRYSTAL
SEGURA, on behalf of her minor child,
TIFFANY SEVCIK, on behalf of her minor
child, BREANNA SIMPSON, on behalf of
her minor child, GARY STANGO, JR., on
behalf of his minor child, NYKITA STEEN,
on behalf of her minor child, MEGAN
TAYLOR, on behalf of her minor child,
MARQUITA TUCKER, on behalf of her
minor child, MARK WADE, on behalf of his

Case No.: 2:19-cv-01214-JCC

**STIPULATED MOTION TO STAY
DEFENDANTS' RESPONSE TO
PLAINTIFFS' COMPLAINT AND
[PROPOSED] ORDER**

NOTE ON MOTION CALENDAR:
September 26, 2019

1 minor child, ALLISON WINSKE, on behalf
2 of her minor child, JESSICA XAGORARIS,
3 on behalf of her minor child, PATRICK
4 YOCKEY, on behalf of his minor child, and
ROBERT YOUNG, on behalf of his minor
child, individually and on behalf of all others
similarly situated,

5 Plaintiffs,

6 v.

7 AMAZON.COM, INC., a Delaware
corporation, and A2Z DEVELOPMENT
8 CENTER, INC., a Delaware corporation,

9 Defendants.

10

11 **STIPULATION**

12 Plaintiffs Jerry Adamsky, Leslie Berry, Valerie Berthelot, Desiree Blackburn, Jennifer
13 Boit, Julie Brown, Sarah Character, Lindsay Colon, Kristi Finley, Christina Gardner, Tara Gray,
14 Shane Howard, Jennifer Leflore, Andra Logan, Jennifer Maurer, Monica Mendez, Erica Moore,
15 Brandie Morgan, Sayuj Paudel, Tara Pittman, Lyndi Reichenbach, Crystal Segura, Tiffany
16 Sevcik, Breanna Simpson, Gary Stango, Jr., Nykita Steen, Megan Taylor, Marquita Tucker,
17 Mark Wade, Allison Winske, Jessica Xagoraris, Patrick Yockey, and Robert Young, on behalf of
18 their minor children, individually and on behalf of all others similarly situated (“Plaintiffs”), and
19 Defendants Amazon.com, Inc. and a2z Development Center, Inc. (collectively, “Defendants”)
20 jointly move to stay the date by which Defendants must respond to Plaintiffs’ complaint (Dkt.
21 No. 1). In support of this request, the Parties state as follows:

22 1. On August 2, 2019, Plaintiffs filed a class action complaint against Defendants.
23 Dkt. No. 1. On August 21, 2019, the Parties filed a stipulated motion for extension of time to
24 respond to the complaint until October 7, 2019. Dkt. No. 23. On August 27, 2019, the Court
25 granted the stipulated motion for an extension of time to respond to the complaint until October
26 7, 2019. Dkt. No. 30.

27 2. The Parties have agreed to stay the responsive pleading date, including a potential
28 motion to compel arbitration, until 30 days after a determination on the motion to compel

1 arbitration in the related case, *B.F. and A.A., minors, by and through their guardian Joey Fields,*
2 *et al. v. Amazon.com, Inc., et al.*, United States District Court for the Western District of
3 Washington, Case No. 2:19-cv-910-RAJ-MLP. The parties further agree to continue the
4 deadline to exchange initial disclosures until 14 days after Defendants file their responsive
5 pleading in this action.

6 3. The Parties further agree, subject to the Court's approval, to postpone the status
7 conference scheduled for November 12, 2019, Dkt. 10, until a date to be determined by the Court
8 after Defendants' deadline to file their response to Plaintiffs' Complaint.

9 4. Pursuant to LR 23, the Parties further agree, subject to the Court's approval, good
10 cause exists to extend the time in which Plaintiffs shall move for a determination under Fed. R.
11 Civ. P. 23(c)(1) to a date to be determined by the Court in a future scheduling order.

12 NOW, THEREFORE, the Parties stipulate and request the Court to stay Defendants' 13 deadline to file a response to Plaintiffs' complaint, including a potential motion to compel 14 arbitration, until 30 days after a determination of the motion to compel arbitration in *B.F. and* 15 *A.A., minors, by and through their guardian Joey Fields, et al. v. Amazon.com, Inc., et al.*, 16 United States District Court for the Western District of Washington, Case No. 2:19-cv-910-RAJ- 17 MLP. The deadline for the parties to exchange initial disclosures shall be continued to 14 days 18 after Amazon files its responsive pleading in this action.

Dated this 26th day of September, 2019.

Respectfully submitted,

By: s/Jeffrey A. Ware
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Classes

[PROPOSED] ORDER

2 Pursuant to the Parties' stipulated request for such relief, the deadline for Defendants to
3 respond to Plaintiffs' complaint is stayed until 30 days after a determination of the motion to
4 compel arbitration pending in *B.F. and A.A., minors, by and through their guardian Joey Fields,*
5 *et al. v. Amazon.com, Inc., et al.*, United States District Court for the Western District of
6 Washington, Case No. 2:19-cv-910-RAJ-MLP. The deadline for the parties to exchange initial
7 disclosures is continued to 14 days after Defendants file their responsive pleading in this action.
8 The status conference scheduled for November 12, 2019, Dkt. 10, is postponed until a date after
9 Defendants' deadline to file their response to Plaintiffs' Complaint to be determined by the
10 Court. Pursuant to LR 23, good cause exists to extend the time in which Plaintiffs shall move for
11 a determination under Fed. R. Civ. P. 23(c)(1) to a date to be determined by the Court in a future
12 scheduling order.

IT IS SO ORDERED.

14 DATED this _____ day of _____, 2019.

THE HONORABLE JOHN C. COUGHENOUR

18 | Presented by:

19 || FENWICK & WEST LLP

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25 *Attorneys for Defendants*
26 AMAZON.COM, INC. and
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CERTIFICATE OF SERVICE

I, Jeffrey A. Ware, hereby certify that on September 26, 2019, I caused the foregoing

STIPULATED MOTION TO STAY DEFENDANTS' RESPONSE TO PLAINTIFFS

COMPLAINT AND [PROPOSED] ORDER to be served on the following parties as indicated

below:

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Dated: September 26, 2019

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